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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE  
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*Epic Games, Inc. v. Google LLC et al.*,  
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.*,  
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF JOHN D. BYARS IN  
SUPPORT OF PLAINTIFFS'  
SUPPLEMENTAL BRIEF ON GOOGLE'S  
CHAT PRODUCTION**

Judge: Hon. James Donato

1 I, John D. Byars, declare as follows:

2 1. I am an attorney duly admitted to practice in the State of Illinois and before this Court  
3 *pro hac vice*. I am a partner at Bartlit Beck LLP, and represent the consumer class in this action. I  
4 submit this declaration in support of the Plaintiffs' Supplemental Brief on Google's Chat Production.  
5 The contents of this declaration are based on my personal knowledge, including my personal  
6 knowledge of the documents cited herein. The facts set forth herein are within my personal knowledge  
7 and if called as a witness, I could and would competently testify to them.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by  
9 Google in this litigation bearing the Bates range GOOG-PLAY5-000453593 to GOOG-PLAY5-  
10 000453594.

11 3. Attached hereto as **Exhibit 2** is an excerpt of a true and correct copy of the deposition  
12 transcript of Sundar Pichai, taken in this litigation on February 27, 2023.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by  
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000436389 to GOOG-PLAY5-  
15 000436394.

16 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by  
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000364738 to GOOG-PLAY5-  
18 000364739.

19 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by  
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000163578 to GOOG-PLAY5-  
21 000163578.

22 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by  
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000374365 to GOOG-PLAY5-  
24 000374366.

25 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by  
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000374364 to GOOG-PLAY5-  
27 000374364.

1           9.       Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by  
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000482224 to GOOG-PLAY5-  
3 000482224.

4           10.      Attached hereto as **Exhibit 9** is a true and correct copy of a document produced by  
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000161588 to GOOG-PLAY5-  
6 000161589.

7           11.      Attached hereto as **Exhibit 10** is a true and correct copy of a document produced by  
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000362732 to GOOG-PLAY5-  
9 000362744.

10          12.      Attached hereto as **Exhibit 11** is a true and correct copy of a document produced by  
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000477797 to GOOG-PLAY5-  
12 000477797.

13          13.      Attached hereto as **Exhibit 12** is a true and correct copy of a document produced by  
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000160237 to GOOG-PLAY5-  
15 000160237.

16          14.      Attached hereto as **Exhibit 13** is a true and correct copy of a document produced by  
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000389042 to GOOG-PLAY5-  
18 000389042.

19          15.      Attached hereto as **Exhibit 14** is a true and correct copy of a document produced by  
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000389043 to GOOG-PLAY5-  
21 000389043.

22          16.      Attached hereto as **Exhibit 15** is a true and correct copy of a document produced by  
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000168593 to GOOG-PLAY5-  
24 000168593.

25          17.      Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by  
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000389029 to GOOG-PLAY5-  
27 000389041.

1           18. Attached hereto as **Exhibit 17** is a true and correct copy of a document produced by  
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000168578 to GOOG-PLAY5-  
3 000168589.

4           19. Attached hereto as **Exhibit 18** is a true and correct copy of a document produced by  
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000383680 to GOOG-PLAY5-  
6 000383682.

7           20. Attached hereto as **Exhibit 19** is a true and correct copy of a document produced by  
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000164222 to GOOG-PLAY5-  
9 000164230.

10          21. Attached hereto as **Exhibit 20** is a true and correct copy of a document produced by  
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000383187 to GOOG-PLAY5-  
12 000383188.

13          22. Attached hereto as **Exhibit 21** is a true and correct copy of a document produced by  
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000382012 to GOOG-PLAY5-  
15 000382015.

16          23. Attached hereto as **Exhibit 22** is a true and correct copy of a document produced by  
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000473143 to GOOG-PLAY5-  
18 000473148.

19          24. Attached hereto as **Exhibit 23** is a true and correct copy of a document produced by  
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000389316 to GOOG-PLAY5-  
21 000389320.

22          25. Attached hereto as **Exhibit 24** is a true and correct copy of a document produced by  
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000364253 to GOOG-PLAY5-  
24 000364253.

25          26. Attached hereto as **Exhibit 25** is a true and correct copy of a document produced by  
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000383422 to GOOG-PLAY5-  
27 000383423.

1           27. Attached hereto as **Exhibit 26** is a true and correct copy of a document produced by  
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000366760 to GOOG-PLAY5-  
3 000366766.

4           28. Attached hereto as **Exhibit 27** is a true and correct copy of a document produced by  
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000163640 to GOOG-PLAY5-  
6 000163649.

7           29. Attached hereto as **Exhibit 28** is a true and correct copy of a document produced by  
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000433345 to GOOG-PLAY5-  
9 000433345.

10          30. Attached hereto as **Exhibit 29** is a true and correct copy of a document produced by  
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000394430 to GOOG-PLAY5-  
12 000394432.

13          31. Attached hereto as **Exhibit 30** is a true and correct copy of a document produced by  
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000423751 to GOOG-PLAY5-  
15 000423751.

16          32. Attached hereto as **Exhibit 31** is a true and correct copy of a document produced by  
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000408349 to GOOG-PLAY5-  
18 000408350.

19          33. Attached hereto as **Exhibit 32** is a true and correct copy of a document produced by  
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000375854 to GOOG-PLAY5-  
21 000375857.

22          34. Attached hereto as **Exhibit 33** is a true and correct copy of a document produced by  
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000383657 to GOOG-PLAY5-  
24 000383660.

25          35. Attached hereto as **Exhibit 34** is a true and correct copy of a document produced by  
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000495759 to GOOG-PLAY5-  
27 000495759.



**E-FILING ATTESTATION**

I, Jessica V. Sutton, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Jessica V. Sutton

Jessica V. Sutton